

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

JOE SHIELDS

*Plaintiff on behalf of himself and
all others similarly situated*

V.

ULTIMATE VACATION GROUP LLC
d/b/a ROYAL BAHAMA CRUISE LINE,
CARIBBEAN CRUISE LINE, INC.,
CELEBRATION CRUISE LINE, LLC,
CELEBRATION CRUISE HOLDING, INC.,
NATIONWIDE RESERVATIONS, LLC, and
BAHAMAS PARADISE CRUISE LINE, LLC

Defendants

CIVIL ACTION NO. 3:14-cv-00285

JURY DEMANDED

MOTION TO TEMPORARILY SEAL DOCUMENTS

Joe Shields (“Plaintiff”) files this motion to temporarily seal Exhibit A attached to his Reply to Defendants Celebration Cruise Line, Caribbean Cruise Line, Celebration Cruise Holding, Nationwide Reservations, and Bahamas Paradise Cruise Line’s Joint Response regarding their Motions to Dismiss (Doc. 85) as follows:

Exhibit A (Doc. 85-1) includes emails produced by Defendants and marked confidential. They are therefore required to be sealed pursuant to the Protective Order entered in this case (Doc. 29). However, Plaintiff has provided notice to the Defendants on August 11, 2015 that they have not designated the emails confidential in good faith and have no reasonable basis for having done so, because the subject emails do not satisfy any of the requirements for having been designated confidential according to the Protective Order (Doc. 29). Defendants have refused to articulate any grounds for having sealed the email communication at this time. Thus, unless the Defendants move the Court and satisfy their burden to keep the emails sealed, Plaintiffs respectfully request

that the Court unseal Exhibit A (Doc. 84-1) on September 11, 2015 according the Protective Order procedures for sealing and unsealing records.

Respectfully submitted,

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By: /s/ David E. Wynne

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CERTIFICATE OF CONFERENCE

The undersigned conferred with opposing counsel on August 11 and 12, 2015 regarding the relief requested in this motion, and they are agreed to sealing the exhibit and to the procedures outlined in the Protective Order for keeping the exhibit under seal.

/s/ David E. Wynne
David E. Wynne

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on all counsel of record either electronically pursuant to the court's ECF noticing system, direct e-mail or facsimile on this the 12th day of August, 2015.

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